



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

July 11, 2018

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

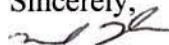
TIM LYNCH
UDAP INDUSTRIES, INC.
1703 WATERLINE ROAD
BUTTE, MT 59701-

Dear Registrant:

The Office of Pesticide Programs acknowledges receipt of your request to cancel supplemental distributor registration number 72007-1-73996 (Pioneer) effective June 20, 2018. If you wish to reinstate this distribution agreement with a distributor in the future, please submit a new signed copy of EPA Form 8570-5, Notice of Supplemental Distributor of a Registered Pesticide Product.

When contacting the Agency, use the following address:

Document Processing Desk (DIST)
Office of Pesticide Programs 7504P
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Sincerely,


Front End Processing Staff
Information Services Branch
Information Technology & Resources Management Division

cc: Anne Marie Scott, Anco Enterprises, Inc.

Yanchulis, Michael

From: Burnett, Gina
Sent: Wednesday, July 11, 2018 12:55 PM
To: Yanchulis, Michael
Cc: Bryceland, Andrew
Subject: FW: Possible use of UDAP's Registration Number without permission.

Hi Mick,

Andy and I aren't sure how to 'cancel' a supplemental distributor product (see below). Can you please advise or point us to the expert.

Thanks!
Gina

Gina Burnett

Senior Regulatory Advisor
Biochemical Pesticides Branch (BPB)
Biopesticides and Pollution Prevention Division (BPPD)
Office of Pesticide Programs
U.S. Environmental Protection Agency
burnett.gina@epa.gov
(703) 605-0513 (phone)
(703) 305-0118 (fax)

From: Smith, Kimberly
Sent: Friday, July 06, 2018 2:15 PM
To: Tim Lynch <TimL@udap.com>; Burnett, Gina <Burnett.Gina@epa.gov>
Cc: Bryceland, Andrew <Bryceland.Andrew@epa.gov>
Subject: RE: Possible use of UDAP's Registration Number without permission.

Mr. Lynch:

We have searched our files and could not locate a form 8570-5 for the Supplemental Distributor listed in the below screen shot. Since you would like the supplemental distributor product cancelled, the Product Manager (PM) in BPPD should cancel this product and place a letter into the corresponding registration file. I have included Ms. Burnett on this email so that she or her PM can cancel the product and notify the distributor. Please feel free to contact me with any questions. I am in the office until 5:30 today and most of next week.

Kimberly Smith

Branch Chief
U.S. EPA/OPP
Information Technology and
Resources Management Division
Information Services Branch
PH: 703-305-6434

From: Smith, Kimberly
Sent: Monday, July 02, 2018 1:09 PM
To: 'Tim Lynch' <TimL@udap.com>
Subject: RE: Possible use of UDAP's Registration Number without permission.

Mr. Lynch:

I am still doing research on this. Here is what I have found thus far: the supplemental product name is active in our system (see screenshot below). During the time of registering this supplemental distributor product, the forms were kept in the primary registrants, 72007-1, registration file. This registration file consists of (5) volumes; three of the volumes are electronic and I have searched those. I will need to search the remaining volumes 4 and 5, to see if I can locate the form. Please note, vole 4 is currently on loan to someone else within our program and I have asked to borrow the file. Once the form is located I should be able to send you a copy. If no form can be located, we will cancel the distributor product and Anco Enterprises, Inc. will need to submit another 8570-5 form with it correctly filled out. In the interim, if you have any questions, please let me know.

Distributor Product

Section 3
Regulatory No: 72007-1 UDAP PEPPER POWER BEAR DETERRENT

Company: 73996 ANCO ENTERPRISES, INC.

Risk Mgr: RM 91: Biologicals & Pollution Prevention Division, PM Team 91

Organization: BPPD / BPB

Current Status: Conditionally Registered (03-Aug-2004)

Distributor Number: 72007-1-73996 Accession Number: 0002662

Product Name	Name Status
PIONEER	Full Text Active

Kimberly Smith

Branch Chief
U.S. EPA/OPP
Information Technology and
Resources Management Division
Information Services Branch
PH: 703-305-6434

From: Smith, Kimberly
Sent: Wednesday, June 27, 2018 10:28 AM
To: 'Tim Lynch' <TimL@udap.com>
Subject: RE: Possible use of UDAP's Registration Number without permission.

Mr. Lynch:

I will check into this and reply back. I am just returning back to the office from vacation and will reply within the next day.

Kimberly Smith

Branch Chief
U.S. EPA/OPP
Information Technology and
Resources Management Division
Information Services Branch
PH: 703-305-6434

ITRMD...Where every customer is a VIP!

From: Tim Lynch [<mailto:TimL@udap.com>]
Sent: Monday, June 25, 2018 10:37 AM
To: Smith, Kimberly <Smith.Kimberly@epa.gov>
Subject: FW: Possible use of UDAP's Registration Number without permission.

Hi Kimberly,

I had a government official send me a bear spray listing that appears to be a sub-registered product from UDAP. I am concerned as UDAP did not authorize this product to be sub-registered. We did not approve any label. We do not know this company either.

Registrant:

ANCO ENTERPRISES, INC.
3923 EAST THUNDERBIRD ROAD #26-56
PHOENIX, AZ 85032

Can you see if the below registration is in your system and if they are in fact a sub-registered bear spray?

If so, we need all paper work on this as UDAP was not involved and did not fill the cans for them nor did we approve of this sub-registration.

[72007-1-73996: PIONEER](#)

Thank You!

Tim Lynch
General Manager
UDAP Industries, Inc.
P: 406-494-9292
F: 406-494-9797
timl@udap.com

From: Burnett, Gina [<mailto:Burnett.Gina@epa.gov>]
Sent: Wednesday, June 20, 2018 12:36 PM
To: Tim Lynch <TimL@udap.com>
Subject: RE: Possible use of UDAP's Registration Number without permission.

Hi Tim,

BPPD only handles registrations, not supplemental distributor registrations.

The person that processes those is in another Division.

You may try contacting:

Kimberly Smith	smith.kimberly@epa.gov	703-305-6434
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She is the Branch Chief in the group that I think may be responsible for this process, although I am not 100% sure.

Thanks,
Gina

Gina Burnett
Senior Regulatory Advisor
Biochemical Pesticides Branch (BPB)
Biopesticides and Pollution Prevention Division (BPPD)
Office of Pesticide Programs
U.S. Environmental Protection Agency
burnett.gina@epa.gov
(703) 605-0513 (phone)
(703) 305-0118 (fax)

From: Tim Lynch [<mailto:TimL@udap.com>]
Sent: Wednesday, June 20, 2018 2:24 PM
To: Burnett, Gina <Burnett.Gina@epa.gov>
Subject: RE: Possible use of UDAP's Registration Number without permission.

Yes, but we did not approve the use of our EPA number for this company. Do you have the sub-registration submission?

Thank You!

Tim Lynch
General Manager
UDAP Industries, Inc.
P: 406-494-9292
F: 406-494-9797
timl@udap.com

From: Burnett, Gina [<mailto:Burnett.Gina@epa.gov>]
Sent: Wednesday, June 20, 2018 12:00 PM
To: Tim Lynch <TimL@udap.com>
Subject: RE: Possible use of UDAP's Registration Number without permission.

Hi Tim,

This is what I am seeing:

https://iaspub.epa.gov/apex/pesticides/f?p=PPLS:8:12108280475618::NO::P8_PUID,P8_RINUM:471053,72007-1-73996

Let me know if the link doesn't work –

Thanks,
Gina

Gina Burnett
Senior Regulatory Advisor
Biochemical Pesticides Branch (BPB)
Biopesticides and Pollution Prevention Division (BPPD)
Office of Pesticide Programs
U.S. Environmental Protection Agency
burnett.gina@epa.gov
(703) 605-0513 (phone)
(703) 305-0118 (fax)

From: Tim Lynch [<mailto:TimL@udap.com>]
Sent: Wednesday, June 20, 2018 1:26 PM
To: Burnett, Gina <Burnett.Gina@epa.gov>
Subject: Possible use of UDAP's Registration Number without permission.

Hi Gina,

I am a bit confused. I had a government official send me a bear spray listing that appears to be a sub-registered product from UDAP. I am concerned as UDAP did not authorize this product to be sub-registered. We did not approve any label. We do not know this company either.

Can you see if the below registration is in your system and if they are in fact a sub-registered bear spray?

If so, we need all paper work on this as UDAP was not involved and did not fill the cans for them nor did we approve of this sub-registration.

[72007-1-73996: PIONEER](#)

Thank You!

Tim Lynch
General Manager
UDAP Industries, Inc.
P: 406-494-9292
F: 406-494-9797
timl@udap.com